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October 11, 2024

Via ECF

Hon. James B. Clark, III
United States Magistrate Judge
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: **In the Matter of the Complaint of Grimaldi Deep Sea S.p.A. as
Owner/Operator of M/V Grande Costa D’Aorio for Exoneration
From or Limitation of Liability
Civil Action No. 2:23-cv-20340-JXN-JBC**

Dear Judge Clark:

I am writing on behalf of Plaintiff Grimaldi Deep Sea S.p.A. (“Grimaldi”) to correct an error in the proposed Amended Scheduling Order, which calls for all discovery disputes to be submitted by December 15, 2024, the date all discovery is due. Port Authority’s counsel, Jeffrey Greenbaum, Esquire, pointed out to me that it is impossible for parties to submit to the court discover disputes on the date discovery is received. (I am grateful to Mr. Greenbaum, and I regret not running the proposed order by him for his excellent advice before submitting it.) Would you please correct the date in paragraph 3 of the proposed order to **02/15/2026**? Thank you.

Respectfully,

s/John J. Levy

John J. Levy

JJL:med

cc: All Counsel of Record (*via ECF notification*)

MONTGOMERY McCRACKEN WALKER & RHOADS LLP

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